

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA, INC.,

*Defendants.*

Case No. 2:24-cv-00228-JRG-RSP

JURY TRIAL DEMANDED

**JOINT CLAIM CONSTRUCTION CHART UNDER P.R. 4-5(d)**

Pursuant to Local Patent Rule 4-5(d), Plaintiff Headwater Research LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) jointly submit this Joint Claim Construction Chart containing the agreed and disputed claim terms, phrases, or clauses of U.S. Patent Nos. 9,609,510 (“510 patent”); 11,096,055 (“055 patent”); and 11,405,429 (“429 patent”). A chart identifying the parties’ disputed constructions is attached as Exhibit A, listing the complete language of claims with terms in bold type and separate columns for each party’s proposed construction, pursuant to P.R. 4-5(d). The parties have not agreed upon any constructions.

Dated: July 18, 2025

Respectfully submitted,

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/s/ Ashley A. Bolt

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**CERTIFICATE OF SERVICE**

I certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Marc Fenster  
Marc Fenster  
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**CERTIFICATE OF CONFERENCE**

I certify that that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties agree on filing this joint statement.

/s/ Marc Fenster  
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